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March 16, 2025

VIA ECF

The Honorable Sidney H. Stein United States District Judge United States District Court for the Southern District of New York 500 Pearl Street New York, NY 10007

Re: <u>United States v. Nadine Menendez, (S4) 23-cr-490 (SHS)/electronics</u>

Dear Judge Stein:

We represent Defendant Nadine Menendez. I apologize to the Court for this after-hours letter. I thought I should send it now, given that voir dire will commence on Tuesday morning, and in light of the Court's instruction to ensure that Your Honor is aware of issues relating to our trial at the earliest possible opportunity, so that they can be addressed without expending the jury's time whenever possible.

Today, Sunday, March 6, I have been in the midst of a lengthy series of email exchanges with two of the prosecutors in this case: one relating to the defense opening statement, and the other to the defense position on government exhibits. I am attaching both of these sets of emails here for the Court's reference. I thought I should submit them to the Court now because both of these email exchanges are somewhat heated, and it appears to me that the government will want to have them addressed before opening statements.

Respectfully submitted,

Jany Colon

Barry Coburn